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JANET NAPOLITANO, GOVERNOR
SUSAN GERARD, DIRECTOR

FAX TRANSMITTAL SHEET

DATE: April 13, 2007

TO: Laboratory Director and QA Manager

FROM: Steven D. Baker, Office Chief
Laboratory Services
State Laboratory Services

Subject: Information Update #95

PAGES: 6 (including cover)

NOTE: If any of the pages are missing, please call 1-800-952-0374, (602) 364-0734 or (602) 364-0733.

THIS MESSAGE AVAILABLE IN ALTERNATIVE FORMAT UPON REQUEST, BY CONTACTING: Prabha Acharya AT (602) 364-0734.

Leadership for a Healthy Arizona

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Information Update

April 13, 2007
Update #95

1. METHOD UPDATE RULE:

a. Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act; National Primary Drinking Water Regulations; and National Secondary Drinking Water Regulations; Analysis and Sampling Procedures, became final on March 12, 2007. This Method Update Rule can be accessed at:
http://www.epa.gov/fedrgstr/EPA-WATER/2007/March/Day-12/w1073.pdf

b. Clarification- Information Update 94, Item 6.c, which quotes:

An aqueous sample may be collected and shipped without acid preservation. However, acid must be added at least 24 hours before analysis to dissolve any metals that adsorb to the container walls (Footnote 19 on page 171). If the sample must be analyzed within 24 hours of collection, add the acid immediately within 15 minutes of sampling and transport at <6 ^{0} C; for specifics see footnote 2, page 161.

This above criteria is applicable to the wastewater methods for metal analysis only, with the exception of boron, mercury and chromium VI (the applicable parameters are listed under the mercury line # 36, Table II on page 39 of 51, at the above EPA website). For drinking water preservation requirements, the individual drinking water methods for metal analysis must be referred.

c. *Aqueous samples must be preserved at ≤6 °C, and should not be frozen unless data demonstrating that sample freezing does not adversely impact sample integrity is maintained on file and accepted as valid by the regulatory authority. Also, for purposes of NPDES monitoring, the specification of ''≤ °C'' is used in place of the ''4 °C'' and ''<4 °C'' sample temperature requirements listed in some methods. It is not necessary to measure the sample temperature to three significant figures (1/100th of 1 degree); rather, three significant figures are specified so that rounding down to 6 °C may not be used to meet the ≤6 °C requirement. The preservation temperature does not apply to samples that are analyzed immediately (*Footnote 18 on Page 41 of 51 at the above EPA website):

We were told by EPA that the above preservation temperature refers to the storage of samples for the applicable wastewater methods only; for drinking water samples, the individual

methods must be referred and that the newer DW methods specify preservation at the higher <6^0 C.

d. **Allowable method modification for wastewater testing can be found on Page 42, under 136.6.b.** ***"…an analyst may modify an approved test procedure (analytical method) provided that the chemistry of the method or the determinative technique is not changed, and provided that the requirements of paragraph (b)(2) of this section are met."***

e. **Changes between the Proposed Rule and the Final Rule can be found on page 3 of 51, under 2.A.1.D.III.**

f. **ADHS Director approval is needed for the new drinking water methods that were not included in the ADHS' new rules; a licensed laboratory must send a letter of request to ADHS for approval.**

The above information is provided for information purposes only; the laboratory staff must read the federal publication in detail and comply with all the specified requirements.

2. **Quanti-tray by IDEXX is approved for E. coli in NPDES wastewater samples in Arizona - see page 15 of the Part C application on http://www.azdhs.gov/lab/license/application.htm**

While Colilert is approved for both Total coliforms and E. coli in drinking water and wastewater, the Quanti-tray is only approved for E. coli in NPDES samples.

3. **Clarification on ADHS licensure renewal process:**

a. **If the changes to the laboratory's licensed parameters need to be made, like dropping or adding of the methods, it should be communicated to our office by a letter or by an e-mail to facilitate the changes to be made in a timely manner.**

b. **All effort must be made to send the application forms and checks together in one mail, not as separate mailings, to make the ADHS office's administrative process more efficient; it facilitates the labs to write the correct amount owed on the checks and also eliminates the possibility of losing one of the correspondence in the mail delivery system.**

c. **Fees should be sent in, as a single check for the total sum billed (application and methods fees). The check amount should not differ from the billed amount unless additional methods are being added and the fees have been properly revised. The new fees do not have combinations or maximums, so all removal and addition of methods should be a simple subtraction or addition of the appropriate fee. Parameter and invoices are reviewed internally before being mailed.**

5. **EPA has approved Konelab's total cyanide analysis for drinking water and wastewater programs; see EPA's letter to EST Analytical which is attached.**

6. **For SM2540C and SM2540D methods, it is acceptable to use Class A graduated cylinders in place of pipets for measuring the sample aliquots. This was confirmed by a communication with EPA.**

7. **ELAC subcommittee is in the process of updating Data Qualifiers rev 2.0. If you have any suggestions, please send an e-mail to acharyp@azdhs.gov .**

8. **Training:**

   a. **A DMRQA Training Seminar is being held at the ADHS Public Conference room on April 20, 2007. The training is being presented by ERA with facilitation by the DMRQA State Coordinator. The fee for the training is $150 per registrant payable to ERA and individuals attending may earn 6 PDH credits from ADEQ. Questions concerning the training may be directed to ERA or to Kathryn Wangsness at (602) 364-0724 or wangsnk@azdhs.gov**

   b. **Save the date for BOD Workshop, June 26, 2007, an all day workshop at the State Lab Conference room. Details will follow.**

9. **Please contact Prabha Acharya @ (602) 364-0734 or acharyp@azdhs.gov for any technical or method related questions. The earlier Information Updates can be accessed @ http://www.azdhs.gov/lab/license/tech/infoup.htm**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
WATER

FEB 13 2007

Larry Anderson
Konelab/AquaKem Product Manager
EST Analytical
503 Commercial Drive
Fairfield, Ohio 45014

RE: ATP Case Nos. D06-0001 and N06-0001

We are pleased to inform you that in the judgement of our technical staff, EST Analytical Method EST-DW CN SM4500-E [Revision Date 01/30/07] is an acceptable version of Standard Method 4500 CN^- C followed by Standard Method 4500 CN^- E (Total Cyanide after Distillation followed by Colorimetric Method). Accordingly, EST Method EST-DW CN SM4500-E, Revision Date 01/30/07 may be used for the determination of total cyanide in drinking water and wastewater compliance monitoring performed under National Primary Drinking Water Regulations (NPDWR) and the National Pollutant Discharge Elimination System (NPDES). Method EST-DW CN SM4500-E uses discreet analysis to determine total cyanide in a manner similar to the approved Standard Methods referenced above. A sample is subjected to a manual reflux-distillation procedure in which cyanide as hydrocyanic acid (HCN) is released from cyanide complexes and absorbed in a sodium hydroxide solution. The cyanide ion in the absorbing solution is converted to cyanogen chloride by reaction with chloramine-T that subsequently reacts with pyridine and barbituric acid to form a red-colored complex which is measured colorimetrcally.

We appreciate your interest in the development of environmental monitoring methods. If you have any questions regarding the review of this alternate test procedure (ATP Case No's D06-001 and N06-0001), please contact Lem Walker at walker.lem@epa.gov or at 202-566-1077 for wastewater or Steve Wendelken at wedelken.steve@epa.gov or at 513-569-7941 for drinking water.

Sincerely,

Lemuel Walker
ATP Coordinator
Engineering and Analysis Division (4303 T)
Engineering and Analytical Support Branch

Steven C. Wendelken, Ph.D.
ATP Coordinator
Technical Support Center (MS-140)
Office of Ground Water and Drinking Water

cc:
USEPA Regional Administrators (all Regions)
Quality Assurance Managers (all Regions)
ATP Coordinators (all Regions)
Water Management Division Directors (all Regions)
Gregory J. Carroll, USEPA, OGWDW
Danielle Carter, CSC, SCC